

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

CGG 17-020567  
Shapiro & DeNardo, LLC  
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Chandra M. Arkema - 029552006  
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Donna L. Skilton - 013072007  
Charles G. Wohlrab - 016592012  
Courtney A. Martin - 098782016  
Jeffrey Rappaport - 003431991  
ATTORNEYS FOR BANK OF AMERICA, N.A.

IN RE:

BRENT R MORRIS AND KATHLEEN E MORRIS FKA  
KATHLEEN E MURRAY, DEBTORS



Order Filed on May 22, 2018  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

CASE NO.: 17-30370-MBK

HEARING DATE: MAY 15, 2018

JUDGE: Honorable Michael B. Kaplan

**CONSENT ORDER RESOLVING MOTION TO VACATE STAY**

The relief set forth on the following pages, numbered two (2) through two (2) is hereby ORDERED.

DATED: May 22, 2018


A handwritten signature of Michael B. Kaplan in black ink, written over a horizontal line.  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

This matter being opened to the Court by Shapiro & DeNardo, LLC, Attorneys for BANK of AMERICA, N.A., hereinafter "Secured Creditor," upon the filing of a Notice of Motion for an Order Vacating Stay in a Chapter 13 Case for failure of the Debtors to make payments on a mortgage loan and due notice of said Motion and the supporting Certification having been given by mail to the Trustee, the Debtors and the attorney for the Debtors, if any, AND CONSENT OF THE PARTIES APPEARING HEREON and for good cause shown,


1. Debtors are currently delinquent in post-petition payments for the months of November 1, 2017 through May 1, 2018 in the total amount of \$17,717.00.
2. To cure the delinquency outlined in Paragraph One (1), \$17,717.00, Debtors agree to remit eleven (11) monthly stipulated cure payments of \$1,476.42, starting June 1, 2018; and one (1) final stipulated cure payment of \$1,476.38 due on May 1, 2019.
3. Starting June 1, 2018, Debtors also agree to maintain all contractually due payments, which currently amount to \$2,531.00.
4. Debtors shall reimburse Secured Creditor \$350.00 in attorney fees and \$181.00 in court costs through the Chapter 13 Plan. The Chapter 13 Standing Trustee shall amend her records to reflect same.
5. If the Debtors fail to make any payments detailed in this Consent Order within fifteen (15) days of the date the payments are due, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by submitting a Certification of Default to the Bankruptcy Court, specifying the Debtors' failure to comply with this Consent Order, with a copy of any application, supporting certification, and proposed Order to be served on the Chapter 13 Standing Trustee, Debtors' Counsel and Debtors as required by the local bankruptcy rules.

We hereby consent to the form, content,  
and entry of the within Order.

Shapiro & DeNardo, LLC

  
Charles G. Wohlrab, Esquire  
Attorney for the Secured Creditor

Date: 5-18-18

  
Justin M. Gillman, Esquire  
Attorney for the Debtors

Date: 5/18/18

**Certificate of Notice Page 3 of 3**  
United States Bankruptcy Court  
District of New Jersey

In re:  
Brent R Morris  
Kathleen E Morris  
Debtors

Case No. 17-30370-MBK  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-3

User: admin  
Form ID: pdf903

Page 1 of 1  
Total Noticed: 1

Date Rcvd: May 22, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 24, 2018.  
db/jdb +Brent R Morris, Kathleen E Morris, 1066 Kearney Drive, North Brunswick, NJ 08902-3229

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: May 24, 2018

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 22, 2018 at the address(es) listed below:

Albert Russo docs@russotrustee.com  
Charles G. Wohlrab on behalf of Creditor BANK OF AMERICA, N.A. cwohlab@logs.com,  
njbankruptcynotifications@logs.com  
Denise E. Carlon on behalf of Creditor Toyota Motor Credit Corporation  
dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com  
Justin M Gillman on behalf of Debtor Brent R Morris abgillman@optonline.net,  
r47252@notify.bestcase.com  
Justin M Gillman on behalf of Joint Debtor Kathleen E Morris abgillman@optonline.net,  
r47252@notify.bestcase.com  
Rebecca Ann Solarz on behalf of Creditor Toyota Motor Credit Corporation  
rsolarz@kmlawgroup.com  
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 7